

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

V.

HERBERT WRIGHT III,

Defendant.

Crim. No. 20-30033-MGM

DEFENDANT'S MOTION TO MODIFY CONDITIONS OF RELEASE (ASSENTED TO)

Now comes Defendant Herbert Wright, III (“Wright”) and submits the following motion to modify certain conditions of his release as set forth in the Court’s Order dated December 16, 2020 (Doc. No. 79), and the United States Attorney’s “No Contacts” list enclosed with correspondence dated February 4, 2021 (Doc. No. 64). In support of this motion, Wright states as follows:

1. The Court's Order for Conditions of Release (Doc. No. 79) requires that the Defendant continue or actively seek employment.
2. The Government's "No Contacts" list (Doc. No. 64), incorporated into Wright's Conditions of Release includes the following individuals: Joseph Bowden, Cecil Davis, Diandre Davis, Kimberly Fernandez, Mykkel Nance and Deandre Woods.
3. Joseph Bowden is Herbert Wright's business partner. Bowden manages Wright's day to day affairs and is the CEO of Wright's record label. Bowden also directs Machine Entertainment Group which holds all of Wright's performance licenses.
4. Diandre Davis books performance events for Wright and acts as a tour manager for him.

5. Kimberly Fernandez is Wright's aunt and works for him part-time as a personal assistant.

6. Mykkel Nance is Wright's personal manager and acts as point of contact between Wright and his label and entertainment lawyer, among others.

7. Deandre Woods is Wright's DJ and a producer for his performances.

8. Wright works as a musician and performer in the music and entertainment industry.

9. In order to comply with the Conditions of his Release and maintain his work in the music and entertainment industry, it is necessary and essential that Wright be permitted to contact Joseph Bowden, Diandre Davis, Kimberly Fernandez, Mykkel Nance and Deandre Woods because all individuals are directly involved in his work.

10. Additionally, the Government's "No Contacts" list includes Cecil Davis, who is Wright's half-brother. Wright and Davis are potential guests at the same family events, and therefore, Wright respectfully requests that he be permitted to contact Davis.

11. Counsel for Wright has conferred with AUSA Steven Breslow, who assents to this motion.

WHEREFORE, Defendant Herbert Wright, III moves that this Honorable Court amend the Conditions of his Release to permit contact with: Joseph Bowden, Cecil Davis, Diandre Davis, Kimberly Fernandez, Mykkel Nance and Deandre Woods.

HERBERT WRIGHT, III,

By his attorney,

/s/ James W. Lawson
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Date: March 30, 2021

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document filed through the CM/ECF system on March 30, 2021 will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and by first-class mail to any non-registered participants.

/s/ James W. Lawson
James W. Lawson